

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:)	
)	Case No. 23-ap-1092-MBK
LTL MANAGEMENT LLC,)	
)	Lead BK Case: 23-12825-MBK
Debtor.)	

**AD HOC GROUP OF MESOTHELIOMA CLAIMANTS’ MOTION FOR ORDER
CERTIFYING DIRECT APPEAL OF PRELIMINARY INJUNCTION ORDER OF APRIL
20, 2023 TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

The Ad Hoc Group Mesothelioma Claimants¹ through undersigned counsel respectfully moves under 28 USC § 158(d)(2)(B) and Bankruptcy Rule 8006 for certification of direct appeal to the U.S. Court of Appeals for the Third Circuit the Order of April 20, 2023, granting in part the Debtor’s motion for a preliminary injunction (“PI Order”), as amended, through and including June 15, 2023. In support of this Motion, the Ad Hoc Group adopts all the arguments advanced in the Request of the Official Committee of Talc Claimants (Adv. Pro. Dkt. 84 (Notice) 84-1 (Request), 84-2 (Proposed Order) 85 (Motion to Shorten Time)).

Respectfully submitted:

¹ The Ad Hoc Group is composed of claimants Katherine Tollefson, Evan Plotkin and Giovanni Sosa (all appellants to the Third Circuit in *LTL1*), joined in this Request by Sandra Weathers, Mary Jackson, Elizabeth Meikle, Marzena Zachara, Robert Radin, Christine Woodfin, and Paul Crouch (Individually and as Executor *Ad Prosequendum* of the Estate of Cynthia Lorraine Crouch) all mesothelioma claimants. See Adv. Pro. Case No. 23-01092-MBK Dkt. 60 (MRHFM Obj. Prelim. Inj.), Dkt. 57 (Paul Crouch Obj.), Dkt. 58 (Evan Plotkin Joinder to Obj.), and Mesothelioma Claimants’ Joinder to Objection of TCC (Case No. 23-12825-MBK, Dkt. 214).

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